

**AGNIFILO
INTRATER**

MEMO ENDORSED

May 9, 2024

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007
ALCarterNYSDChamber@nysd.uscourts.gov

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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Re: United States v. Jacobs, 20 CR 660 (ALC)

Dear Judge Carter:

We write the Court requesting a modification of Mr. Jacobs's pre-trial release conditions, specially a modification permitting the release of his passport.

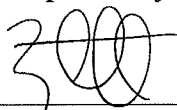
As the Court knows, Mr. Jacobs pled to a one count Superseding Information to a misdemeanor before Your Honor on May 2, 2024, and is now facing sentencing, which is scheduled for September. And, as the Court may recall from numerous prior applications (all of which have been unopposed and granted), Mr. Jacobs has a business installing and servicing credit card processing machines. He works with businesses in the Dominican Republic and has taken several trips there in the past (and has always, of course, returned). Mr. Jacobs would like to attend meetings with his counterparties in the Dominican Republic. He would also like to be able to travel for personal reasons.

He has applied for several prior travel modifications, each expanding his range of locations he may go, including multiple prior applications for travel to the Dominican Republic and other foreign locations. The Court has graciously granted each of those requests. Mr. Jacobs, in turn, has returned within the allotted time from each trip, and has scrupulously abided by all his bail conditions.

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We have communicated with the Government (AUSAs Samuel Raymond and David Felton) and Pretrial Services. The Government has no objection, and Pretrial Services takes no position, which Mr. Jacobs appreciates very much.

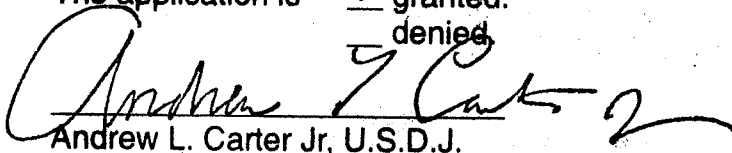
Respectfully Submitted,



Zach Intrater
Marc Agnifilo

cc: AUSAs Samuel Raymond & David Felton (via email)
Pretrial Services Officer Taelor Nisbeth (via email)

The application is ☒ granted.
☐ denied.



Andrew L. Carter Jr, U.S.D.J.

Dated: 5-15-24

NY, New York